

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

LOCAL UNION NO. 626, UNITED BROTHERHOOD	:	
OF CARPENTERS AND JOINERS OF AMERICA	:	
PENSION FUND, et al.	:	
Plaintiffs	:	CIVIL ACTION
	:	NO. 02-2761
v.	:	
	:	
MIDDLE STATES DRYWALL, INC., et al.	:	
	:	
Defendants	:	

**REQUEST TO ENTER DEFAULT PURSUANT TO F.R.C.P. 55(a)
AGAINST
MIDDLE STATES DRYWALL, INC. AND COLDIRON ENTERPRISES, INC. ONLY**

You will please enter a default on Defendants Middle States Drywall, Inc. and Coldiron Enterprises, Inc., only, for their failure to plead or otherwise defend the Amended Complaint filed on October 11, 2002, or the Complaint filed May 8, 2002, as provided in Rule 55(a) of the Federal Rules of Civil Procedure as appears in the attached declaration of Shelley R. Goldner, Esquire.

Respectfully submitted,

JENNINGS SIGMOND, P.C.

By: s/Shelley R. Goldner
SHELLEY R. GOLDNER, ESQUIRE (ID. NO.32896)
KENT G. CPREK (ID. NO.40806)
The Penn Mutual Towers
510 Walnut Street, 16th Floor
Philadelphia, PA 19106
(215) 351-0644/0615
Attorneys for Plaintiffs

Date: January 13, 2003

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FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

LOCAL UNION NO. 626, UNITED BROTHERHOOD	:	CIVIL ACTION
OF CARPENTERS AND JOINERS OF AMERICA	:	
PENSION FUND, et al.	:	
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	:	
Plaintiffs	:	
v.	:	
	:	
MIDDLE STATES DRYWALL, INC., et al.	:	
	:	
	:	
Defendants	:	NO. 02-2761

DECLARATION OF SHELLEY R. GOLDNER FOR ENTRY OF DEFAULT

Shelley R. Goldner, Esquire, having been first duly sworn according to law, hereby
deposes and states as follows:

1. I am the attorney for the Plaintiffs in the above-entitled action.
2. The Complaint and Summons and Amended Complaint in this action were served on the Defendants Middle States Drywall, Inc. and Coldiron Enterprises, Inc. (“Defendants”), by Gerald Taylor, Process Server, on December 22, 2002, as appears from the Affidavits of Service of the Complaint and Amended Complaint which have been duly docketed with the Court.
3. The time in which the Defendants may answer or otherwise move as to the Complaint and Amended Complaint has expired.
4. The Defendants have not answered or otherwise moved and the time for Defendants to answer or otherwise move has not been extended.
5. Inasmuch as the Defendants are corporations, they are neither infants nor

incompetent persons and are not in the military service.

I declare under penalty of perjury in accordance with 28 U.S.C. §1746 that the foregoing is true and correct to the best of my knowledge, information and belief

Executed on : January 13, 2003

s/Shelley R. Goldner
SHELLEY R. GOLDNER, ESQUIRE

CERTIFICATE OF SERVICE

I, Shelley R. Goldner, Esquire, statue under penalty of perjury that I caused a copy of the foregoing Request to Enter Default Pursuant to F.R.C.P. 55(a) Against Defendants Middle States Drywall, Inc. and Coldiron Enterprises, Inc. Only to be served via first class mail, postage prepaid on the date and to the addresses below:

John D. Coldiron
845 Waterway Road
Oxford, PA 19363

Brenda Peterson
25 Good Hope Road
Landenberg, PA 19350

Michael T. Imms Esquire
Crawford, Wilson & Ryan, LLC
220 West Gay Street
West Chester, PA 19380

Middle States Drywall, Inc.
25 Good Hope Road
Landenberg, PA 19350

Walter Flamm, Esquire
Flamm, Boroff & Bacine, P.C.
Union Meeting Corporate Ctr.
925 Harvest Drive, Suite 200
Blue Bell, PA 19422

Coldiron Enterprises, Inc.
25 Good Hope Road
Landenberg, PA 19350

Greg Peterson
25 Good Hope Road
Landenberg, PA 19350

Date: January 13, 2003

s/Shelley R. Goldner

SHELLEY R. GOLDNER, ESQUIRE

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